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December 5, 2011

By Fax (212) 805-7901  
Honorable Harold Baer, Jr.  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Francisco Quintero v. City of New York, et al.*, 11 CV 4524 (HB)(FM)

Your Honor:

I am the plaintiff's counsel in the above-referenced case. I write to ask for an extension of time to extend discovery and to amend the complaint to join additional parties. Counsel for defendants has consented to both of these requests. This is plaintiff's first request.

According to the Proposed Pre-Trial Scheduling Order, the plaintiff had until October 31, 2011 to amend the Complaint to add additional parties. Plaintiff has been conferring with and waiting for defense counsel to provide him with the names and service addresses of the other officers before seeking court intervention. Last week, plaintiff consented to allow defendants until December 7, 2011 to respond to plaintiff's discovery demands, which were due November 7, 2011. As defense counsel still does not have the information pertaining to the other officers but has consented to allow plaintiff to amend the complaint within two weeks of furnishing this information to plaintiff, plaintiff asks that the Court grant the extension under these terms.

Because there are parties that have yet to be added to the case and the discovery deadline is January 9, 2012, plaintiff asks that the discovery deadline be extended to February 17, 2012. As the parties do not anticipate any dispositive motion being filed, this extension will not affect the placement of this case on the March 2012 Trial Trial Calendar. I thank the Court for its consideration of these requests.

cc: ACC David Pollack (by email)

SO ORDERED:

Harold Baer, Jr., U.S.D.J.

Date: 12/6/11

*Cover to the Court  
this with the  
trial calendar  
and never  
make any  
extension*

Endorsement:

Come to the Court sooner - this will make the schedule tight and the trial month which never changes "iffy" but I'll allow extension.